

FILED 27 NOV '24 11:08 JBC:CRP

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland DIVISION

Mikel Alexander Hutchinson
(Enter full name of plaintiff)

Plaintiff,

v.

Civil Case No. 3:24-cv-01992-SI
(to be assigned by Clerk's Office)

COMPLAINT FOR VIOLATION OF CIVIL
RIGHTS (PRISONER COMPLAINT)

Multnomah County's
Inverness Jail

Jury Trial Demanded

☒ Yes

☐ No

(Enter full name of ALL defendant(s))

Defendant(s).

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: _____

Street Address: _____

City, State & Zip Code: _____

Telephone No.: _____

Defendant No. 1 Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

Defendant No. 2 Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

Defendant No. 3 Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

Defendant No. 4 Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (*check all that apply*):

- ☐ Federal officials (a *Bivens* claim)
☒ State or local officials (a § 1983 claim)

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

~~negligence~~ negligence, reckless endangerment
due to prior knowledge of the screen being
broken

III. STATEMENT OF CLAIMS

Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

On November 17th I had a video visit scheduled on terminal #1. There was a piece of the kiosk's glass screen that was broken in jagged pieces. When logging in to my visit my hand was sliced by the broken glass. When my fiancé and I noticed the blood running down my hand I notified the deputy. The deputy made notes of the incident and put up a sign closing down the kiosk. The deputy could only give me band-aids and told me to ask the following deputies for assistance but the next 3 shifts also denied aid.

Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

(If you have additional claims, describe them on another piece of paper, using the same outline.)

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

☒ Yes

☐ No


V. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

50,000.00

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 21st day of November, 2024.


(Signature of Plaintiff)

Mickel Alexander Hutchinson #844458

11540 NE Inverness Drive

Portland, OR 97220

PORTLAND OR RPDC 972

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Mark D. Hatfield U.S. Courthouse

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LEGAL MAIL

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